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Attorneys for Intervenor-Defendant
Imperial Valley Solar, LLC

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF CALIFORNIA

QUECHAN TRIBE OF THE FORT YUMA
INDIAN RESERVATION, a federally
recognized Indian Tribe,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF THE
INTERIOR; UNITED STATES BUREAU OF
LAND MANAGEMENT; KEN SALAZAR,
Secretary of the Interior; ROBERT ABBEY,
Director Bureau of Land Management; TERI
RAML, District Manager, BLM California Desert
District; MARGARET GOODRO, Field
Manager, BLM El Centro Field Office,

Defendants.

IMPERIAL VALLEY SOLAR, LLC,
Intervenor-Defendant.

Case No. 10-CV-2241 LAB CAB

**JOINT MOTION TO APPROVE
STIPULATION TO CONTINUE
STATUS CONFERENCE**

Date: n/a
Time: n/a
Courtroom: E
Judge: Hon. Cathy Bencivengo

Action Filed: October 29, 2010

Pursuant to Local Rule 7.2 the parties to the above captioned action seek the
Court's approval of the following stipulation:

1 WHEREAS, a status conference in this matter is set for February 14, 2011 before
2 the Honorable Cathy A. Bencivengo;

3 WHEREAS, Imperial Valley Solar, LLC was acquired by Sun Lake Solar, LLC, a
4 wholly owned subsidiary of AES Solar Power, LLC ("New Project Proponent"), on February
5 8th, 2011;

6 WHEREAS, the New Project Proponent would like to have time to evaluate the
7 status of the project and the issues before the Court; and

8 WHEREAS, the parties agree that a continuance is warranted and a status
9 conference would be more productive at a later date;

10 THEREFORE, the parties stipulate as follows:

11 The status conference set for February 14, 2011 should be continued to a date and
12 time convenient for the Court between March 1, 2011 and March 3, 2011.

13
14 **IT IS, THEREFORE, SO AGREED AND STIPULATED.**

15 Respectfully submitted this 11th day of February, 2011

16 **For Plaintiffs:**

For Defendant-Intervenor:

17 /s/ Thane D. Somerville
18 THANE D. SOMERVILLE
Morisset, Schosser, & Jozwiak

/s/ Ella Foley Gannon
ELLA FOLEY GANNON
Bingham McCutchen LLP

19 **For Federal Defendants:**

20 /s/ David B. Glazer
21 DAVID B. GLAZER
22 United States Department of Justice

CERTIFICATE OF SERVICE

I, Ella Foley Gannon, hereby certify that on February 11, 2011, I caused the foregoing to be served upon counsel of record through the Court's electronic service system.

I declare under penalty of perjury that the foregoing is true and correct.

Dated: February 11, 2011

/s/ Ella Foley Gannon
Ella Foley Gannon